

PATENT  
450101-02352**REMARKS/ARGUMENTS**

Reconsideration and withdrawal of the rejections of the application are respectfully requested in view of the amendments and remarks herewith, which place the application into condition for allowance. The present amendment is being made to facilitate prosecution of the application.

**I. STATUS OF THE CLAIMS AND FORMAL MATTERS**

Claims 1, 3-27 and 29-92 are in the application. Claims 1, 3-27 and 29-52 are currently pending. Claims 53-92 were previously withdrawn without prejudice or disclaimer of subject matter. Claims 2 and 28 are hereby canceled. Claims 1 and 27 are independent. Claims 1, 3, 27 and 29 and are hereby amended. No new matter has been introduced. Support for this amendment is provided throughout the Specification as originally filed.

Changes to the claims are not made for the purpose of patentability within the meaning of 35 U.S.C. §101, §102, §103, or §112. Rather, these changes are made simply for clarification and to round out the scope of protection to which Applicants are entitled.

**II. REJECTIONS UNDER 35 U.S.C. §103**

Claims 1-52 were rejected under 35 U.S.C. §103(a) as allegedly anticipated by U.S. Patent No. 5,598,216 to Lee in view of 6,404,817 to Saha et al. (hereinafter merely "Saha"). Applicant respectfully traverses this rejection.

Independent claim 1, as amended, is illustrative and recites, *inter alia*:

"parsing said video/audio signals and extracting therefrom motion vectors of said video/audio signals, DCT-coefficients and macroblock-type;

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... wherein said extraction step includes a step of calculating the block relevance metric of all blocks according to said DCT-coefficients in the current frame to determine a block having high relevance as a candidate of the feature point selected as the next feature point based on said motion estimation step." (Emphasis added).

As understood by the Applicants, Lee '216 discloses a video signal encoding apparatus that determines quasi-feature points on the current frame based on selected feature points on the previous frame. A predicted current frame is obtained based on a number of regions formed by the quasi-feature points. The feature points are determined by a grid technique employing various types of grids. Col. 4, line 62 to col. 5, line 5 and FIGS. 4A-4B, 5A-5B.

In contrast, claim 1 recites, "parsing said video/audio signals and extracting therefrom motion vectors of said video/audio signals, DCT-coefficients and macroblock-type . . . wherein said extraction step includes a step of calculating the block relevance metric of all blocks according to said DCT coefficients in the current frame to determine a block having high relevance as a candidate of the feature point selected as the next feature point based on said motion estimation step." That is, the block relevance metric is calculated according to the DCT-coefficients for every block in the current frame. A block is selected having high relevance as a candidate of the feature point selected as the next feature point. Thus, in the present application the block selected as a candidate for the next feature point is determined according to the DCT-coefficients.

Neither Lee '216 nor Saha teaches or suggests calculating a block relevance metric calculated according to the DCT-coefficients. As understood by Applicant, Lee determines a number of feature points among the pixels in the previous frame. The feature points are determined by a grid technique employing various types of grids. The feature points are located at the nodes of the grids. Col. 4, line 53 to col. 5, line 5 and FIGS. 3 and 4A-4B.

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There is no suggestion in Lee that the selection of the feature points is related to the DCT-coefficients of a selected block as recited in the present application. Indeed, Lee is distinguishable from the present invention by, at least, in the method by which feature points are selected. Saha does not add the feature missing from Lee.

Claim 1 is patentable over Lee and Saha because those references taken either alone or in combination teach or suggest each and every limitation recited in the claim. In particular, Lee '216 does not disclose, "calculating the block relevance metric of all blocks according to said DCT-coefficients in the current frame to determine a block having high relevance as a candidate of the feature point selected as the next feature point based on said motion estimation step." as recited in claim 1.

For reasons similar or somewhat similar to those described above with regard to independent claim 1, independent claim 27 is also believed to be patentable.

### III. DEPENDENT CLAIMS

As stated above, the dependent claims depend from one of the claims discussed above and are therefore believed patentable for at least the same reasons. Because each dependent claim is also deemed to define an additional aspect of the invention, however, the individual reconsideration of the patentability of each on its own merits is respectfully requested.

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450101-02352**CONCLUSION**

Claims 1-52 are in condition for allowance. In the event the Examiner disagrees with any of statements appearing above with respect to the disclosure in the cited reference, or references, it is respectfully requested that the Examiner specifically indicate those portions of the reference, or references, providing the basis for a contrary view.

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In view of the foregoing amendments and remarks, it is believed that all of the claims in this application are patentable and Applicants respectfully request early passage to issue of the present application.

Respectfully submitted,

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